

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF ALABAMA

IN RE:) CHAPTER 13
SEKEYA FLEMING)
Debtor(s).) CASE NO. 16-30941-DHW-13

OBJECTION TO CONFIRMATION

Now comes The Health Care Authority for Baptist Health, An Affiliate, by its attorneys, Chambless Math ❖ Carr, P.C., and objects to confirmation of the Debtor's proposed plan and in support thereof states as follows:

1. This creditor has filed a claim in the amount of \$12,265.44 of which \$9,9066.10 is secured by a Hospital Lien on insurance proceeds related to a motor vehicle accident which occurred pre-petition.
2. The Debtor's schedules do not indicate that the debtor has any cause of action related to the motor vehicle accident.
3. Upon information and belief, the Debtor has hired an attorney to help her with the personal injury case, and it appears settlement is probable in the near future.
4. The Debtor failed to list the debt of this Creditor in her schedules and the plan makes no provision for repayment of this debt from lawsuit proceeds upon which this creditor holds its Hospital Lien.

WHEREFORE, The Health Care Authority for Baptist Health, An Affiliate, prays for an Order denying confirmation along with such further relief as the Court may deem proper.

The Health Care Authority for Baptist Health, An Affiliate

By: /s/ Leonard N. Math

Of Counsel:
Chambless Math ❖ Carr, P.C.
P.O. Box 230759
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served on all attorneys of record as set forth below by electronic notice and/or depositing a copy thereof in the United States mail postage prepaid on this June 17, 2016.

Curtis C. Reding
Chapter 13 Trustee
P.O. Box 173
Montgomery AL 36101

JOSHUA C. MILAM
566 S. PERRY STREET
MONTGOMERY AL 36104

SEKEYA FLEMING
4205 SPRING PARK COURT
MONTGOMERY AL 36116

/s/ Leonard N. Math